

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
GREAT AMERICAN INSURANCE COMPANY OF
NEW YORK,

Plaintiff,

- against -

ADVANCE OCEAN INC., NIPPON YUSEN
KAISHA, NYK LINE (NORTH AMERICA) INC.,
BURLINGTON NORTHERN SANTA FE
CORPORATION, BNSF RAILWAY COMPANY,
THE BURLINGTON NORTHERN AND SANTA FE
RAILWAY COMPANY,

Defendants.
-----X

**ANSWER TO CROSS
CLAIMS**

07 CIV 6421 (PAC)(THK)

Defendants BURLINGTON NORTHERN SANTA FE CORPORATION, BNSF RAILWAY
COMPANY, THE BURLINGTON NORTHERN AND SANTA FE RAILWAY COMPANY
("Defendants" or "Answering Defendants"), by their attorneys, Landman Corsi Ballaine & Ford P.C.,
hereby answer the Cross Claims of Defendant ADVANCE OCEAN, INC. ("Advance Ocean")
asserted against them in Advance Ocean's Answer to Amended Complaint with Cross-Claims:

FIRST: Defendants repeat and re-allege each and every admission, denial, and defense
set forth in its Answer to Amended Complaint.

**WITH RESPECT TO THE CROSS CLAIMS AGAINST BURLINGTON NORTHERN
SANTA FE CORPORATION, BNSF RAILWAY COMPANY, THE BURLINGTON
NORTHERN SANTA FE RAILWAY COMPANY**

SECOND: Defendants deny the truth of each and every allegation contained in
paragraphs "FIRST" and "SECOND" in the "CROSS-CLAIMS AGAINST CO-DEFENDANTS
NIPPON YUSEN KAISHA, NYK (NORTH AMERICA) INC., BURLINGTON NORTHERN

SANTA FE CORPORATION, BNSF RAILWAY COMPANY, THE BURLING NORTHERN SANTA FE RAILWAY COMPANY” of Advance Ocean’s Answer to Amended Complaint with Cross-Claims.

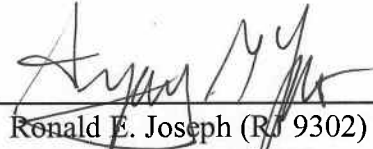
WHEREFORE, Answering Defendants demand judgment dismissing the Cross Claims asserted against it, together with the costs and disbursements of this action; and that the Court award such other relief as it may deem just and proper.

Dated: New York, New York
January 22, 2008

Respectfully submitted,

LANDMAN CORSI BALLAINE & FORD P.C.

By: _____


Ronald E. Joseph (RJ 9302)

Arjay G. Yao (AY 506)

Attorneys for Defendants

BURLINGTON NORTHERN SANTA FE
CORPORATION, BNSF RAILWAY
COMPANY, THE BURLINGTON
NORTHERN AND SANTA FE
RAILWAY COMPANY

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TO: KINGSLEY KINGSLEY & CALKINS
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Hicksville, New York 11801
(516) 931-0064

JUNGE & MELE LLP
Attorneys for Advance Ocean, Inc.
29 Broadway
9th Floor
New York, New York 10006

AFFIDAVIT OF SERVICE BY MAIL

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

Jelena Brigida, being duly sworn, deposes and says, that deponent is not a party to the action, is over 18 years of age and resides at BROOKLYN, NEW YORK.

That on the 22nd day of January, 2008, deponent served the within **ANSWER TO CROSS CLAIMS** upon

KINGSLEY KINGSLEY & CALKINS
Attorneys for Plaintiff
91 West Cherry Street
Hicksville, New York 11801

JUNGE & MELE LLP
Attorneys for Advance Ocean, Inc.
29 Broadway, 9th Floor
New York, New York 10006

attorneys in this s action, at the addresses designated by said attorneys for that purpose by depositing a true copy of same enclosed in a postpaid properly addressed wrapper, in an official depository under the exclusive care and custody of the United States post office department within the State of New York.



Jelena Brigida

Sworn to before me this
22nd day of January, 2008



Notary

LAURIE EGAN
Notary Public, State of New York
No. 01EG5062768
Qualified in Orange County
Commission Expires Aug. 7, 2010